EXHIBIT F

Jay Vosburgh 11/17/05

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	IN THE UNITED STATES DISTRICT (ากมหา
	FOR THE DISTRICT OF UTAH, CENTRAL I	DIVISION
_		
	BUE GGO GROUP	
	THE SCO GROUP,)
	Plaintiff,)
) Case No.
	VS.)
	INTERNATIONAL BUSINESS MACHINES) 2:03CV0294DAK
	CORPORATION,)
	330.2 31.1.1 2 31.1,)
	Defendant.)
)
)
VIDEOTAPED DEPOSITION OF JAY VOSBURGH		
November 17, 2005		
Redmond, Washington		
•	Reported by:	
	David A. Hart	
	CCR No. 2007	
	Job No. 75289/179359	

Jay Vosburgh 11/17/05

Page 120 Page 118 1 A. They were archived copies from the revision control system to a network within the LTC? 1 relating to bonding work. Said work for bonding has now been 2 A. To a network? 2 3 MR. BROOKS: Objection. Vague. 3 public with the previous -- the previous versions are still 4 THE WITNESS: All copying between on my computer. 5 computers typically takes place over a network. Q. And this was a revision control system for Linux? A. Not specifically for Linux but ... 6 Q. (By Mr. Donohue) Is there a specific place within a network Q. But that's -- that's where the -- was this Linux code that --7 in the LTC where what work is -- is copied? 8 A. I'm not sure I understand your question. that was in the revision control system? Q. Do you use SCP? 9 A. Yes. It's Linux source code. 9 A. SCP? 10 Q. Was there other source code that you found? 10 Q. Do you know what that means? A. At what time? 11 12 A. Yes. It's the secure copy program. 12 O. This -- when you -- when you looked just recently. A. No. That was all that I found at the time. It was subject 13 Q. And do you use that program? 13 14 A. Yes. 14 to disclosure. 15 Q. And what do you use it for? 15 Q. What else did you find that was subject to disclosure that A. Copying files between computers. was on your sandbox? 16 16 Q. Do you use SSH? A. That was all. 17 17 Q. Were there other documents that you found just recently on 18 A. Yes. 18 19 that were subject to disclosure? Q. And what do you use that for? 19 20 A. Accessing computers remotely. 20 A. Recently being when? Q. Any other similar programs you use besides S- -- excuse me --21 Q. I think you had mentioned about two weeks ago. 21 A. No. It was just those two things. Three things. 22 SCP or SSH? 22 Q. Have you used a remote access program like SSH to access a 23 A. The FTP, file transfer protocol, program. 23 machine that has ptx code on it while you were working at 24 Q. With respect to the machines that you described that are at 24 25 25 your home, have you ever had ptx source code on those Page 121 Page 119 1 A. At any time? 1 machines? Q. At any time. 2 A. No, I have not. 3 A. No. Q. Not at any time? 3 Q. Can you describe to me what -- what a sandbox is. A. Not at any time. Q. Have you ever had any System V code on those machines? A. Not specifically at this time. Counsel sent me a precise A. No, I have not. 6 definition that I worked against. And I cannot quote it. 6 MR. BROOKS: Even if you could quote 7 Q. Are there any previous machines that you have had at your 7 8 8 home that have contained ptx source code? it --9 I'm going to instruct the witness not to testify in any 9 A. No. 10 detail about instructions received from counsel. 10 Q. Any previous machines that you maintained at your home that Q. (By Mr. Donohue) Putting aside the instruction you received 11 had System V source code? 11 from counsel, do you have a general understanding of what a 12 12 13 sandbox is? 13 Q. Are you familiar with the term "sandbox" as it relates to A. Vaguely. It's not a term I normally use. 14 computer programming? 14 Q. Could you just give me what understanding you do have about a 15 A. Of recent. Yes. 16 sandbox. 16 Q. And how is it that -- that you became familiar with that 17 A. A development system that is -- or a development environment 17 that is used for work that may be destructive to the system A. One of the counsel here asked me at one point to check my 18 18 itself unless it's on a separate area where it cannot damage 19 19 sandbox to see if I had any remaining files that I had missed 20 previously for disclosure. 20 critical information. Q. And physically where does this -- where is the sandbox 21 Q. And when was that? 21 22 located? A. Approximately two weeks ago. 22 A. What do you mean? 23 23 Q. And did you locate any files on your sandbox? 24 Q. Is it -- is it -- is it a file that's -- that's in your 24 A. Yes. 25

31 (Pages 118 to 121)

computer or --

25 Q. And what were those files?